

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KESIA PRICE, Individually and on Behalf  
of All Other Persons Similiary Situated,

Plaintiffs,

-against-

PORTER NOVELLI, INC. and OMNICOM  
GROUP, INC.,

Defendants.

07 Civ. 5869 (PAC)

**SUPPLEMENTAL AND  
AMENDED CASE  
MANAGEMENT PLAN AND  
SCHEDULING ORDER**

The Civil Case Management Plan and Scheduling Order dated and filed September 18, 2007 is hereby supplemented and amended as follows:

1. Paragraphs 5 and 13 are hereby amended: All fact discovery shall be completed no later than April 18, 2008.
2. Paragraphs 6(c) and 13 are hereby amended: Depositions to be completed by April 18, 2008.

SO ORDERED:

By: 

HON. PAUL A. CROTTY  
United States District Judge

Dated: New York, New York  
March 12, 2008



**LOCKS LAW FIRM**

PLLC

110 East 55th Street  
New York, New York 10022  
T 212.838.3333  
T 866.LOCKSLAW  
F 212.838.3735  
lockslaw.com

Andrew P. Bell  
abell@lockslawny.com

March 11, 2008

**VIA E-MAIL**

Hon. Paul Crotty  
United States District Court, Southern District of New York  
500 Pearl Street, Room 735  
New York, New York 10007

Re: *Price v. Price Novelli, Inc., et al.*  
07 Civ. 5869(PAC)

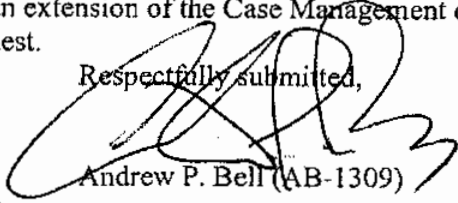
Dear Judge Crotty:

We represent the plaintiff in the above-referenced FLSA putative collective action. This letter is submitted to respectfully request that this Court extend the fact and deposition cut-off dates from March 14, 2008 to April 18, 2008 (see attached proposed order), or in the alternative, to dates to be agreed upon by counsel for all parties and the Court at the Court Conference presently scheduled for March 18, 2008 at 2:00 p.m. Defense counsel consents to the one-month extension.

Discovery has been proceeding in this case. Defendants' document production consists of over 20,000 pages of documents and was substantially completed by January 30, 2008, but with a small number of additional documents produced on February 29, 2008. Defendants took the deposition of the Plaintiff on March 4, 2008. Following Plaintiff's initial review of Defendants' production, the parties had a lengthy meet-and-confer conference on March 5, 2008. While the 30(b)(6) depositions of Defendants are scheduled, Plaintiff seeks an adjournment of them so counsel can get Defendants' amended and/or supplemental discovery responses and any additional documents that may be discovered by Defendants stemming from the meet-and-confer. Accordingly, Plaintiffs request an adjournment of the fact and deposition cut-off dates from next Friday, March 14, 2008 and believe that a new scheduling order (moving subsequent dates, if necessary) would be most appropriate.

This is the second request for an extension of the Case Management dates. Thank you for your consideration of this request.

Respectfully submitted,

  
Andrew P. Bell (AB-1309)

cc: John D. Shyer, Esq. (via email)  
Amy S. Donovan, Esq. (via email)